

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

IN RE:	)	
	)	
GEORGE A. O'NEAL, Jr.,	)	
JULIE F. O'NEAL,	)	
605 McDONALD COURT	)	BK. NO. 3:15-bk-03827
NASHVILLE, TN 37217	)	CHAPTER 13
SSN: XXX-XX-2601; XXX-XX-0164	)	JUDGE CHARLES M. WALKER
Debtor(s).	)	

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**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: SEPTEMBER 14, 2016. IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: SEPTEMBER 28, 2016, 8:30 a.m., Courtroom 1, 2<sup>nd</sup> Floor Customs House, 701 Broadway, Nashville, TN 37203**

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**RESPONSE TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS**

Come now the Debtors, by and through the undersigned counsel, and would respond to the Chapter 13 Trustee's motion to dismiss as follows:

1. Debtors would admit that they did in fact miss a payment into their plan.
2. Debtors would show that this occurred due to an unavoidable personal expense that interfered with their ability to pay.
3. Debtors would show that their lives are now back on track and they have in fact been making payments as required to the Trustee and furthermore they have set up the TFS System in support of not missing future payments.

Wherefore Debtor respectfully requests that the Chapter 13 Trustee's Motion to Dismiss be denied.

Respectfully submitted,

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/s/ J. Michael Combs  
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